

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ROME DIVISION**

**LORI WRIGHT and TEDDY E.
WRIGHT, as Next Friends and
Parents of Destin Wright, Deceased**

Plaintiffs,

vs.

**JOHNNY MOATS, Individually and in
his Official Capacity as Polk County
Sheriff; J. KELLY MCLENDON,
Individually and in His Official Capacity
as Polk County Sheriff; POLK COUNTY,
GEORGIA; SOUTHERN HEALTH
PARTNERS, INC.; K. HEATH, LPN;
SHANNON TURNER, LPN;
J. THOMAS, LPN; and BETTY
FOWLER, LPN in their Individual
Capacities; JOHN DOES I, II, and
JANE DOES I, II, and III, in their
Individual Capacities**

Defendants.

**CIVIL ACTION FILE
NO.: 4:15-CV-00059-HLM**

**PLAINTIFF TEDDY E. WRIGHT'S AMENDED NOTICE OF
VIDEO DEPOSITION OF J. THOMAS, LPN**

To: J. Thomas, LPN
c/o Shira Adler Crittendon
Schreeder Wheeler & Flint, LLP
1100 Peachtree Street, NE, Suite 800
Atlanta, GA 30309-4516

You are hereby noticed that on **October 21, 2016**, beginning at **10:00 A.M.**, at Gammon, Anderson & McFall, 105 Prior Street, Cedartown, Georgia 30125, counsel for Plaintiff will proceed to take the video deposition of **J. THOMAS, LPN**, upon oral examination for the purposes of discovery and all other purposes allowed under the law, pursuant to Federal Rules of Civil Procedure Rules 26 and 30. The video deposition will be taken before an officer duly authorized to administer oaths and to take depositions. The video deposition will be recorded stenographically. The oral examination will continue from day to day until its completion.

This 14th day of October, 2016.

/s/ Robert K. Finnell

Georgia State Bar No. 261575

The Finnell Firm

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Attorney for Teddy E. Wright

/s/ H.L. Cromartie, III

Georgia State Bar No. 197190

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Attorney for Teddy E. Wright

CERTIFICATE OF SERVICE

This is to certify that I have this day served counsel for Defendant with a true and exact copy of the **PLAINTIFF TEDDY E. WRIGHT'S AMENDED NOTICE TO TAKE VIDEO DEPOSITION OF J. THOMAS, LPN**, by filing same with the Clerk of the Court using the CM/ECF system which will automatically send email notification of such filing to the following attorney of record:

Clarence Victor Long
Office of C. Victor Long
4995 Erin Road
Atlanta, GA 30331

Jennifer Jenivene Neal-Jones
Neal Jones & Handrick Law, LLC
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Buford, GA 30518

Shira Adler Crittendon
Schreeder Wheeler & Flint, LLP
1100 Peachtree Street, NE, Suite 800
Atlanta, GA 30309-4516

This 14th day of October, 2016.

/s/ H.L. Cromartie, III
H.L. Cromartie, III
Georgia State Bar No: 197190
Attorney for Plaintiff

CERTIFICATE OF COMPLIANCE WITH LR 5.1(C)

This is to certify that the foregoing pleading was prepared using Times New Roman 14 point in accordance with LR 5.1(C).

H.L. CROMARTIE III, P.C.

/s/ H.L. Cromartie, III

H.L. Cromartie, III

Georgia State Bar No: 197190

Attorney for Plaintiff